

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

KOREA ADVANCED INSTITUTE OF  
SCIENCE AND TECHNOLOGY

Plaintiff,

v.

KIP CO., LTD. f/k/a KAIST IP Co., Ltd.;  
P&IB CO., LTD.;  
IN GYOO KANG;  
KIPB LLC f/k/a KAIST IP US LLC;  
PAULINA FUNDINGCO, LLC; and  
U.S. BANK NATIONAL ASSOCIATION

Defendants.

Case No. 2:22-CV-00317-WED

Action Filed: March 5, 2022

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**DEFENDANTS KIP CO., LTD., P&IB CO., LTD., IN GYOO KANG, AND  
KIPB LLC'S RULE 11 MOTION FOR SANCTIONS**

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Defendants KIP Co., Ltd., P&IB Co., Ltd., In Gyoo Kang, and KIPB LLC respectfully move this Court for sanctions under Rule 11 of the Federal Rules of Civil Procedure. Plaintiff Korea Advanced Institute of Science & Technology ("KAIST") and its attorneys have violated Rule 11(b) with their frivolous claims and positions, rendering KAIST's breach of contract claims against Defendants KIP Co., Ltd. and P&IB Co., Ltd. legally untenable. The grounds for this motion are further set forth in Defendants' Memorandum in Support of their Rule 11 Motion for Sanctions, which is being filed contemporaneously herewith.

Dated: September 13, 2022

Respectfully submitted,

*/s/ Hyung Gyu Sun*

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Ltd., In Gyoo Kang, and KIPB LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of September 2022, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the foregoing was served by electronic delivery to the following registrants:

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